

Seyfarth Shaw LLP  
Jennifer R. Brooks (State Bar No. 14480)  
jrbrooks@seyfarth.com  
700 Milam Street, Suite 1400  
Houston, Texas 77002-2812  
Telephone: (713) 225-2300  
Facsimile: (713) 225-2340

CLARK HILL, PLLC  
Gia N. Marina  
gmarina@clarkhill.com  
1700 S. Pavilion Center Drive  
Suite 500  
Las Vegas, NV 89135  
Telephone: (702) 697-7541

*Counsel for Defendant  
Equifax Information Services LLC*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

MELISSA JEAN COLEMAN,  
Plaintiff,

v.

EQUIFAX INFORMATION  
SERVICES, LLC,  
Defendant.

Case No.: 2:24-cv-00398-ART-DJA

**STIPULATION TO EXTEND PRETRIAL DEADLINES**

Defendant Equifax Information Services LLC (“Equifax”) and Plaintiff Melissa Coleman (“Plaintiff”), hereby file this Stipulation to Extend Pretrial Deadlines by ninety (90) days, and respectfully show the Court as follows:

1. On April 16, 2024, this Court entered its Discovery Plan and Scheduling Order setting forth the pretrial deadlines for this litigation. ECF No. 9.
2. This is the first request for an extension of pretrial deadlines.

3. The parties are working diligently to complete discovery by September 16, 2024. Specifically, the Parties have served Requests for Admissions, Interrogatories and Requests for Production; Equifax has issued third-party subpoenas; Equifax has taken Plaintiff's deposition; and the Parties have exchanged expert disclosures. The Parties are scheduling the deposition of Equifax's corporate representative, as well as of Plaintiff's fact witnesses.

4. Pursuant to Local Rule 26-3(b) and (c), remaining to be completed are 14 -15 subpoenas duces tecum and deposition notices to third parties that Equifax is currently preparing. As Plaintiff contends that she was denied obtaining a mortgage, it is important that Equifax obtain documents from third-parties and depose Plaintiff's witnesses. Equifax is further scheduling the depositions of Plaintiff's expert witness and the deposition of Equifax's representative. Given the amount of third-party discovery and the scheduling of expert and party depositions, including Equifax's pending protective order motion regarding its corporate representative deposition, more time is needed than the initial time limits set by the discovery plan.

5. Federal Rule of Civil Procedure 6(b) provides trial courts with the authority to extend time periods. The Parties believe good cause exists to extend the scheduling order given the discovery that is in progress but requires a completion timeframe that exceeds September 16, 2024.

6. As such, the Parties respectfully request that the Scheduling Order Deadlines be extended as follows:

| Event                        | Current Deadline   | Proposed Deadline |
|------------------------------|--------------------|-------------------|
| <b>Discovery cutoff date</b> | September 16, 2024 | December 16, 2024 |
| <b>Dispositive motions</b>   | October 16, 2024   | January 14, 2025  |
| <b>Pretrial order</b>        | November 15, 2024  | February 14, 2025 |

7. The Parties believe this extension would allow the Parties sufficient time to further evaluate the claims and defenses, take upcoming party and third-party

1 depositions, complete any necessary follow-up discovery, and facilitate settlement  
2 negotiations.

3 8. As such, good cause exists for the extension, no Party will be prejudiced,  
4 and the extension is not being sought for the purposes of delay.

5 WHEREFORE, Defendant Equifax Information Services LLC and Plaintiff  
6 Melissa Coleman hereby stipulate and request that the Court enter an Order extending  
7 the pretrial deadlines by ninety (90) days.

8 Respectfully submitted this 11th day of September, 2024.

9 MELISSA J. COLEMAN

CLARK HILL, PLLC

11 By: /s/ Melissa J. Coleman

By: /s/ Gia N. Marina

12 Melissa J. Coleman  
13 620 Harvester Course Drive  
14 Las Vegas, NV 89148

15 *Plaintiff, Pro Se*

Jennifer R. Brooks, Bar No. 14480  
\* *Admitted Pro Hac Vice*  
SEYFARTH SHAW LLP  
2323 Ross Avenue  
Suite 1660  
Dallas, Texas 75201  
Telephone: (469) 608-6730  
Email: jrbrooks@seyfarth.com

Gia N. Marina  
CLARK HILL, PLLC  
1700 S. Pavilion Center Drive  
Suite 500  
Las Vegas, NV 89135  
Telephone: (702) 697-7541  
Email: gmarina@clarkhill.com

*Counsel for Defendant*  
*Equifax Information Services LLC*

21 IT IS THEREFORE ORDERED that the parties' stipulation (ECF No. 28) is GRANTED.  
22 IT IS FURTHER ORDERED that Defendant's motion to extend pretrial deadlines (ECF No. 15)  
23 is DENIED AS MOOT.

24   
25 DANIEL J. ALBREGTS  
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: September 12, 2024  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on September 11, 2024, I presented the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Gia N. Marina

Gia N. Marina

*Counsel for Defendant*

*Equifax Information Services LLC*